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VIA ECF

Hon. Arun Subramanian
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Joint Letter-Motion for Extension of Time to File Dispositive and *Daubert* Motions in *Flynn et al v. Cable News Network, Inc.*, No. 1:21-cv-02587-AS-SLC (S.D.N.Y.)

Dear Judge Subramanian:

We represent Defendant Cable News Network, Inc. (“CNN”) in the above-referenced action. On behalf of the parties, we write to [REDACTED] jointly request that this action’s summary judgment deadlines be extended [REDACTED].

On August 1, 2023, the Court ordered the parties to file summary judgment motions by September 25, 2023; oppositions no later than four weeks after the service of any summary judgment motions; and replies, if any, no later than two weeks after the service of the relevant opposition. ECF No. 165. Per Judge Woods’ Individual Rule 3.F and Your Honor’s Individual Rule 8.J, any motions to exclude expert testimony must be made by those same deadlines.¹

[REDACTED]

Due to [REDACTED] the parties jointly seek an extension of time to comply with the Court’s most recent scheduling order (ECF No. 165). Specifically, the parties jointly request that the deadline to file dispositive and motions to exclude expert testimony be extended through and including October 27, 2023. Amending deadlines within a scheduling order is proper for good cause shown. Fed. R. Civ. P. 16(b)(4). [REDACTED]

¹ On September 8, 2023, this case was reassigned from Judge Woods to Judge Subramanian.

ATTORNEYS FOR CABLE NEWS NETWORK,
INC.